

IN THE UNITED STATE BANKRUPTCY COURT
WESTERN DISTRICT OF MICHIGAN

In re: Kelli Ann O'Brien,

Debtor.

Case No. 20-00081

Chapter 13

Hon. John T. Gregg

Date filed: 1/9/2020

DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS

The Debtor by and through her attorneys, USADebt Bankruptcy Attorneys, responds to the Trustee's motion to dismiss as follows:

1. The Debtor will provide recent copies for one of her jobs (the other job is closed for the pandemic), 2018 state tax return. She has not completed her 2019 tax return.
2. She will resume payments to the plan
3. The Debtor and the attorney will review the assets regarding the liquidation analysis.

For these reasons, the Debtor requests that the Trustee withdraw the motion to dismiss, or that the Court deny the Trustee's motion or that the Court hear argument for the denial of the Trustee's motion.

USADebt Bankruptcy Attorneys

Date: May 11, 2020

By: /s/ *Jeremy B. Shephard* (P72719)
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